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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

AMTRUST NORTH AMERICA, INC., )  
a Delaware corporation; and )  
TECHNOLOGY INSURANCE )  
COMPANY, INC., a New Hampshire )  
corporation, )

Plaintiffs, )

-vs- )

SAFEBUILT INSURANCE )  
SERVICES, INC., a California )  
corporation a/k/a SAFEBUILT )  
WHOLESALE INSURANCE )  
SERVICES, INC., )  
THE TAFT COMPANIES, LLC, a )  
Maryland corporation, )  
PREFERRED )  
GLOBAL HOLDINGS, INC., a )  
Montana corporation, )  
DAVID E. PIKE, individually, )  
DAVID )  
E. PIKE, INC., a Nevada corporation, )  
PHILIP SALVAGIO, individually, )  
SALMEN INSURANCE SERVICES, )  
INC., a California corporation f/k/a )  
SALVAGIO, INC., CARL M. SAVOIA, )  
JOHN DOE CORPORATIONS 1-5, and )  
JOHN DOES 1-5, )

Defendants. )

Case No. \_\_\_\_\_

SD NY Case No. 14-cv-9494

**MISCELLANEOUS ACTION  
RE MOTION TO ENFORCE  
SUBPOENA AND COMPEL  
DISCOVERY**

**(Related Case: US Court  
Southern District of New York  
Case No. 14-cv-9494)**

Plaintiffs AmTrust North America, Inc. ("AmTrust") and Technology Insurance Company, Inc. ("Technology"), pursuant to Rule 45, Fed.R.Civ.P., hereby file this Miscellaneous Action and Motion to Enforce Subpoena and Compel Discovery. Plaintiffs request that the Court enforce its Subpoena issued to Moulton Bellingham, PC, and compel the production of enumerated documents requested therein. Whether the documents can be withheld under confidentiality as claimed by Moulton Bellingham, PC, is novel under Montana law, and the underlying court deferred interpretation of the statutes at issue to the Montana court. As this Court's decision impacts discovery in the underlying matter, the fact discovery deadline for which is April 11, 2016, Plaintiffs respectfully request an expedited opinion and order in this matter which will allow for the timely completion of still pending discovery in the Southern District of New York.

DATED this 10<sup>th</sup> day of February, 2016.

By: /s/ Perry J. Schneider  
Perry J. Schneider

MILODRAGOVICH, DALE  
& STEINBRENNER, P.C.  
*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was served by consent via email upon the following individuals this 10th day of February, 2016:

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*Attorneys for Defendants and Interested Non-party Pacific Re, Inc.*

DATED this 10<sup>th</sup> day of February, 2016.

By: /s/ Perry J. Schneider  
Perry J. Schneider

MILODRAGOVICH, DALE  
& STEINBRENNER, P.C.

